

**EXHIBIT E**

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re

PURDUE PHARMA, L.P., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case Nos.19-23649 (RDD)

(Jointly Administered)

Hearing Date:

Objections due by:

**DECLARATION OF SCOTT R. BICKFORD**

Pursuant to 28 U.S.C. § 1746, I, Scott R. Bickford, hereby declare as follows:

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Adlon Therapeutics L.P. (6745), Greenfield Bio Ventures L.P. (6150), Imbrium Therapeutics L.P. (8810) Seven Seas Hill Corp. (4591), Ophir Green Corp (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' mailing address is One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901. For ease of reference, the term "Purdue" as used herein, refers to Debtors. For the purposes of this Motion, all allegations set forth herein related to or pertaining to "Manufacturers" apply equally to Purdue.

**EXHIBIT**

**E**

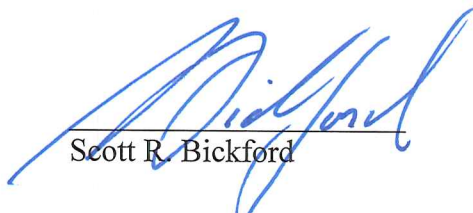
1. I am an attorney licensed to practice in Louisiana. My bar number is LA 1165. I am one of the lead attorneys for Legal Guardians of neonatal abstinence syndrome (“NAS”) Children in the above-described bankruptcy proceeding.<sup>2</sup>

2. Over eighty (80) class and individual actions have been asserted by Legal Guardians of NAS Children against the Debtors (sometimes hereinafter referred to as “Purdue”) and other manufacturers, suppliers and pharmacy defendants seeking, among other things, relief for their NAS Children in the form of abatement and medical surveillance. Attached to this declaration as **Exhibit 1** is a true and correct copy of a list of those actions.

3. I am also one of the attorney members of the NAS Ad Hoc Children’s Committee in the above-described case and have been actively engaged in communications with the Debtors related to their Noticing Plan. On January 7, 2020, I sent a letter to Debtors’ counsel which stated that the Noticing Plan “fails to recognize in substance or even in name the issue of the more than 500,000 children who were born diagnosed as NAS or under some other diagnostic classification indicating those children’s exposure to an opiate in the womb and subsequent birth.” Attached to this declaration as **Exhibit 2** is a true and correct copy of the January 7, 2020 letter.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 8th day of July 2020.

  
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Scott R. Bickford

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<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion by NAS Guardians on behalf of the NAS Children’s Abatement Class Action Claimants for Entry of an Order Pursuant to Fed. R. Bankr. P. 9014 and 7023 Permitting them to File a Class Proof of Claim and Granting Related Relief.

Client Name	Case Type	Suit filed date	Individual Docket #	State
Roach, Tyler	Class Action	2/26/18	1:18-op-45662-DAP	Louisiana
Rees, Derric and Ceonda	Class Action	2/28/18	1:18-op-45252-DAP	Illinois
Salmons, Walter and Virginia	Class Action	3/2/18	1:18-op-45268-DAP	W. Virginia
Wood, Rachel	Class Action	3/3/18	1:18-op-45264-DAP	Missouri
Ambrosio, Melissa	Class Action	3/16/18	1:18-op-45375-DAP	California
Roxie Whitley, Chris and Diane Denson	Class Action	3/16/18	1:18-op-45598-DAP	Tennessee
Doyle, Erin	Class Action	5/9/18	1:18-op-46327-DAP	Ohio
Hunt, Shannon	Class Action	5/10/18	1:18-op-45681-DAP	Maryland
Moore, Bobbi Lou	Class Action	8/15/18	1:18-op-46305-DAP	West Virginia
Hanlon, Amanda	Class Action	8/23/18	1:19-op-45052-DAP	New York
Hampel, Jessica	Class Action	6/14/19	1:19-op-45473-DAP	Alabama
Gilson, Jamiee	Individual	6/14/19	1:19-op-45461-DAP	Alaska
Peterson, Sally	Class Action	6/14/19	1:19-op-45472-DAP	Arkansas
Whittaker, Shelly	Class Action	6/14/19	1:19-op-45475-DAP	Colorado
Brumbarger, Brandi	Class Action	6/14/19	1:19-op-45469-DAP	Indiana
Means, Corey	Class Action	6/14/19	1:19-op-45470-DAP	Louisiana
Cruz, Gloria	Class Action	6/14/19	1:19-op-45466-DAP	Massachussetts
Ellis, Esperenza	Class Action	6/14/19	1:19-op-45464-DAP	New Mexico
DeMaro, Samantha	Class Action	6/14/19	1:19-op-45465-DAP	Oklahoma
Lechuga, Niola	Class Action	6/14/19	1:19-op-45468-DAP	Oregon
Paul, Chloe	Class Action	6/14/19	1:19-op-45467-DAP	South Carolina
Rodriguez, Jessica	Class Action	6/14/19	1:19-op-45463-DAP	Utah
Tuttle, Nicole	Class Action	6/15/19	1:19-op-45476-DAP	Delaware
Hamawi, Marijha; Meghan Lara	Class Action	6/15/19	1:19-op-45477-DAP	Kentucky
Gauthier, Krista; Angela Sawyers; Jessica Springborn	Class Action	6/15/19	1:19-op-45478-DAP	Michigan
Delancey, Christina	Class Action	6/15/19	1:19-op-45480-DAP	Nevada
Simonson, Alicia	Class Action	6/15/19	1:19-op-45479-DAP	North Dakota
Stewart, Wendy	Class Action	6/15/19	1:19-op-45481-DAP	Ohio
Cherry, Angela	Class Action	6/16/19	1:19-op-45490-DAP	Arizona
Warren, Desirae	Class Action	6/16/19	1:19-op-45486-DAP	Georgia
Weatherwax, Quincy	Class Action	6/16/19	1:19-op-45483-DAP	Montana
Flach, Brittany	Class Action	6/16/19	1:19-op-45488-DAP	New Jersey
Ivie, Billie	Class Action	6/16/19	1:19-op-45489-DAP	North Carolina
Carlson, Desiree	Class Action	6/16/19	1:19-op-45487-DAP	Pennsylvania
Williams, Farrah	Class Action	6/16/19	1:19-op-45485-DAP	Tennessee
Martinez, Jacquelynn	Class Action	6/16/19	1:19-op-45484-DAP	Virginia
Shewmake, Shilo	Class Action	6/16/19	1:19-op-45482-DAP	Washington
Berzinski, April	Individual	6/17/19	1:19-op-45503-DAP	Wisconsin
Brant, Shelby L.	Class Action	6/17/19	1:19-op-45494-DAP	Arizona
Artz, Jennifer	Class Action	6/17/19	1:19-op-45459-DAP	California
Johnson, Jamie	Individual	6/17/19	1:19-op-45504-DAP	Indiana
Martin, Penny	Individual	6/17/19	1:19-op-45508-DAP	Indiana
Muffley, Amanda	Individual	6/17/19	1:19-op-45507-DAP	Maryland
Meinecke, Kjells	Class Action	6/17/19	1:19-op-45493-DAP	Minnesota
Alexander, Melba	Individual	6/17/19	1:19-op-45502-DAP	Mississippi
Kirk, Krystle	Individual	6/17/19	1:19-op-45509-DAP	North Carolina
Collier, Jessica	Individual	6/17/19	1:19-op-45506-DAP	Ohio
Howell, Reannan	Individual	6/17/19	1:19-op-45520-DAP	Texas
Ortiz, Maria	Class Action	6/17/19	1:19-op-45492-DAP	Wisconsin
Johnson, Aracya	Individual	6/18/19	1:19-op-45521-DAP	Alaska

Client Name	Case Type	Suit filed date	Individual Docket #	State
Goss, Heather	Individual	6/18/19	1:19-op-45518-DAP	Colorado
Martin, Kimberly	Individual	6/18/19	1:19-op-45510-DAP	Florida
Gauthier, Mechelle	Individual	6/18/19	1:19-op-45514-DAP	Florida
Tindall, Nichole	Individual	6/18/19	1:19-op-45530-DAP	Florida
Lively, Carol	Individual	6/18/19	1:19-op-45523-DAP	Georgia
Lyle, Alyssa	Individual	6/18/19	1:19-op-45524-DAP	Georgia
Hutchins, Kiana	Individual	6/18/19	1:19-op-45505-DAP	Indiana
Kommer, Elizabeth	Individual	6/18/19	1:19-op-45522-DAP	Indiana
Gibson, Amanda	Individual	6/18/19	1:19-op-45515-DAP	North Carolina
Massey, Melanie	Individual	6/18/19	1:19-op-45525-DAP	North Carolina
Dixon, Deborah	Individual	6/18/19	1:19-op-45511-DAP	South Carolina
Herring, Courtney	Individual	6/18/19	1:19-op-45519-DAP	South Carolina
Goldman, Jenni	Individual	6/18/19	1:19-op-45516-DAP	Texas
McAnany, Samantha	Individual	6/18/19	1:19-op-45526-DAP	Texas
Shockley, Kayla	Individual	6/18/19	1:19-op-45527-DAP	Texas
Taylor, Jessica	Individual	6/18/19	1:19-op-45528-DAP	Texas
Taylor, Lori	Individual	6/18/19	1:19-op-45529-DAP	Texas
Goforth, Rebecca	Individual	6/20/19	1:19-op-45532-DAP	Colorado
Atkinson, Sandra	Individual	6/20/19	1:19-op-45531-DAP	Florida
Perkins, Jessica	Individual	6/20/19	1:19-op-45535-DAP	Florida
Thomas, Jennifer	Individual	6/20/19	1:19-op-45542-DAP	Florida
Watson, Paula	Individual	6/20/19	1:19-op-45545-DAP	Florida
Wright, Naomi	Individual	6/20/19	1:19-op-45543-DAP	Illinois
Shepard, Amy	Individual	6/20/19	1:19-op-45536-DAP	Kentucky
Chancey, Musette	Individual	6/20/19	1:19-op-45533-DAP	Minnesota
Whittington, Kaegan	Individual	6/20/19	1:19-op-45541-DAP	Mississippi
Scully, Jenny	Individual	6/20/19	1:19-op-45544-DAP	New York
Puckett, Heather	Individual	6/20/19	1:19-op-45439-DAP	North Carolina
Richardson, Waikeisha	Individual	6/20/19	1:19-op-45538-DAP	North Carolina
VonCannon, Caroline	Individual	6/20/19	1:19-op-45540-DAP	North Carolina
Taylor Brooke Underwood	Individual	6/20/19	1:19-op-45537-DAP	Tennessee
Patterson, Gena	Individual	6/20/19	1:19-op-45534-DAP	Texas



John R. Martzell (1937-2007)  
Scott R. Bickford \*  
Lawrence J. Centola, III  
Neil F. Nazareth  
Spencer R. Doody  
Jason Z. Landry  
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Office Administrator

\* also licensed in  
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January 7, 2020

**By email and by facsimile:**

**james.mcclammy@davispolk.com, et al.**

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New York, New York 10017  
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*Counsel to the Debtors  
and Debtors in Possession*

**Re: In re Purdue Pharma, L.P, et al. (the "Debtors")  
Case No. 19-23649 (RDD)(Jointly Administered)**

Dear Mr. McClammy:

I am writing on behalf of the Purdue NAS Baby Ad Hoc Committee (the "NAS Ad Hoc") concerning the Debtors' Motion for Entry of an Order (I) Establishing Deadlines for Filing Proofs of Claim and Procedures Relating Thereto, (II) Approving Proof of Claim Forms and (III) Approving the Form and Manner Thereof [Dkt. 717] and the noticing plan set forth in the accompanying Affidavit of Jeanne C. Finegan in support thereof. [Docket 719].

As a preliminary matter, the NAS Ad Hoc would like to thank you for working with it to improve the proof of claim form. In connection therewith, as set forth in Harold Israel's December 3, 2019 email to you, a copy of which is attached hereto as Exhibit A, we submitted several comments in connection with the Debtors' proposed noticing plan. Unfortunately, the plan, as evidenced by Ms. Finegan's affidavit, disregarded those comments.

While comprehensive in many other respects, it does not propose to provide notice to NAS babies, NAS children and/or those whom have care, custody or control of them. As you know from your own data and our discussions, a portion of this population is in low socioeconomic status which elevates the need for a more robust notice process.

Specifically, it fails to recognize in substance or even in name the issue of the more than 500,000 children who were born diagnosed as NAS or under some other diagnostic classification indicating those children's exposure to an opiate in the womb and subsequent birth. Ms. Finegan's affidavit

January 7, 2020

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even fails to mention the words "baby," "children," or even "NAS." While numerous chat groups, Facebook pages and related social media target NAS babies and their caregivers not a single one is referenced in Ms. Finegan's affidavit. The plan further fails to address by name or by reference any specifics as to how the contact of birth mothers, relatives or legal guardians would take place or how such contacts would be so targeted. The plan description also fails to address notice to facilities and programs which provide treatment for the educational, developmental and teratogenic effects of in utero opiate exposure.

Further examples of exclusion of full and fair notice to the NAS class of claimants may be found in Ms. Finegan's list of publications which purport to give further notice. None of these publications, found in paragraph 60 of her affidavit, are directed toward OB/GYNs nor pediatricians/nurses who would treat neonates or children presenting with an array of NAS symptoms. Moreover, there seems to be no attempt to reach the existing birth registries which have listed NAS births. Finally, there is not a mention of a public service campaign targeted to any of the aforementioned groups.

In short, Ms. Finegan's affidavit fails to set forth any research or documentation which seeks to identify and quantify the population of NAS children, their caregivers or the programs and the people who address their ongoing needs. Failing to achieve that important and necessary function, Ms. Finegan's proposed program cannot and does not identify and target this diverse group for full and fair notice.

It is my understanding that the Debtors and Prime Clerk are continuing to modify the notice plan. We would prefer to resolve these matters without the need to file a formal objection. In that light, after you have had time to discuss this matter with Ms. Finegan, please let us know at your earliest convenience when we may talk about these deficiencies.

Yours truly,

MARTZELL, BICKFORD & CENTOLA



Scott R. Bickford

Cc: Arik Pries, Akin Guimp, by email  
Mitchell Hurley, Akin Gump, by email  
Justin Alberto, The Bayard Firm, by email  
Erin Fay, The Bayard Firm, by email

SRB/jh